

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**GILBERT JAMES,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO: 3:11cv221**

**ENCORE CAPITAL GROUP, INC.,  
MIDLAND FUNDING, LLC and  
MIDLAND CREDIT MANAGEMENT, INC.**

**Defendants.**

**MOTION FOR AN ENLARGEMENT OF TIME TO SERVE  
EXPERT WITNESS DISCLOSURES**

Plaintiff, by counsel, moves the court to extend the time in which the Plaintiff shall file his Expert Disclosures and Reports. The court previously entered an Agreed Order extending the time for Defendants to respond to Discovery to October 17, 2011. The Plaintiff's Experts have thus been unable to review the Defendants' Discovery Responses and document production necessary for the disclosures and reports.

Accordingly, the Plaintiff requests a two-week extension to file the Expert Disclosure and Report to October 31, 2011.

For good cause shown, the Plaintiff respectfully requests that the court grant the motion to extend the time in which the Plaintiff may file his Expert Disclosure and Report to October 31, 2011. This request is made before the expiration of the deadline addressed and would not prejudice Defendants who will still have sufficient time to depose and challenge Plaintiff's experts.

Respectfully submitted,

GILBERT JAMES,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of October, 2011, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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